

AGREED FACTS:

1. RJM received a consumer dispute verification form (“CDV”) from Experian on or about July 21, 2003, stating that the Plaintiff had notified Experian that he disputed the RJM collection account on his credit report.
2. RJM’s representative wrote the RJM account number that corresponded with the account referenced in the CDV on the top right hand corner of the CDV.
3. RJM reported back to Experian by forwarding the filled-in CDV back to Experian that the account information had been verified as reported.
4. On or about July 25, 2003, RJM received a CDV from Trans Union disputing the accuracy of the RJM collection account as reported by RJM.
5. First, RJM’s representative wrote the RJM account number that corresponded with the account referenced in the CDV on the top right hand corner of the CDV.

Respectfully submitted,

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